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Attorneys for Plaintiff TRINA GUNNARSON

14 TRINA GUNNARSON } Case No.: 2:20-cv-02107-CB
15 Plaintiff, } STIPULATION TO EXTEND TIME
16 v. } TO FILE MOTION FOR REMAND
17 KILOLO KIJAKAZI, } (FIRST REQUEST)
18 Acting Commissioner of Social }
19 Security, }
20 Defendant. }

21 Plaintiff Trina Gunnarson and Defendant Kilolo Kijakazi, Acting
22 Commissioner of Social Security, through their undersigned attorneys, stipulate,
23 subject to this court's approval, to extend the time by 24 days from July 9, 2021 to
24 August 2, 2021 for Plaintiff to file a Motion for Remand, with all other dates in the
25 Court's Order extended accordingly. This is Plaintiff's first request for an
26 extension. This request is made at the request of Plaintiff's counsel to allow

1 additional time to fully research the issues presented. Counsel requests the
2 extension due to an increase in workload related to the re-opening and processing
3 of several administrative records close in time. Additionally, in the past weeks
4 Counsel has been called to assist family after a family member suffered a stroke
5 and is now bedridden and lost the ability to speak. Counsel apologizes for the
6 inconvenience this request has caused.

7 DATE: July 29, 2021 Respectfully submitted,
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9
10
11

LAW OFFICES OF LAWRENCE D. ROHLFING

/s/ *Cyrus Safa*

BY: _____

Cyrus Safa
Attorney for plaintiff Trina Gunnarson

13 DATE: July 29, 2021 Christopher C. Chiou
14 *Acting United States Attorney*

ORDER

IT IS SO ORDERED.

DATE: July 30, 2021

THE HONORABLE CARLA BALDWIN
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:20-CV-02107-CB**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on July 30, 2021.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ *Cyrus Safa*

Cyrus Safa
Attorneys for Plaintiff